

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION  
*This document relates to:*  
*Track Three Cases*

MDL 2804  
Case No. 17-md-2804  
Hon. Dan Aaron Polster

**PLAINTIFFS LAKE AND TRUMBULL COUNTIES' RESPONSE TO ORDER  
REGARDING MOTION TO COMPEL**

Plaintiffs Lake and Trumbull Counties write in response to the Court's February 18, 2022 Order. (*See* Dkt. No. 4283.) In that Order, the Court held,

Plaintiffs are **ORDERED** to provide declarations or other support for the estimates provided in their February 1 letter and response. Additionally, to the extent reasonable, Plaintiffs must attempt to apportion the estimated expenditures into Dr. Alexander's four top-level categories. If, however, there is no good faith basis for further breakdown of departmental expenditures, Plaintiffs must provide support for that assertion as well. Finally, to the extent Defendants' motion seeks more information than required by this order or would limit Plaintiffs from using evidence in Phase 2 of this trial, the motion is **DENIED**.

(*Id.* at 3.)

Pursuant to the Court's Order, Plaintiffs reaffirm that the Counties' "financial data does not allow anyone to determine with specificity exactly what each department spent on each element of opioid epidemic abatement." (Dkt. No. 137 at 1-2.)

As such there is no good faith basis for further breakdown of departmental expenditures. In support of this, Plaintiffs attach hereto declarations from: (1) Debra E. Santangelo, Chief Deputy Auditor for Trumbull County; and (2) Michael Matas, Budget/Finance Director for Lake County. (*See* Exhibit 1, Declaration of Debra E. Santangelo and Exhibit 2, Declaration of Michael Matas.)

Additionally, in support of the estimates provided in Plaintiffs' February 1 letter and response Plaintiffs submit declarations from: (3) Kimberly Fraser on behalf of Lake County; and (4) April Caraway on behalf of Trumbull County. (*See* Exhibit 3, Declaration of Kimberly Fraser and Exhibit 4, Declaration of April Caraway.)

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Hunter J. Shkolnik

Hunter J. Shkolnik